

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S MOTION FOR
DISTRIBUTION OF COMMON BENEFIT FEES AND EXPENSES**

The Plaintiffs' Steering Committee hereby seeks an order from this Court (i) approving an eight percent (8%) assessment from available funds for common benefit fees and expenses, (ii) approving the payment of reasonable expenses made in support of common benefit efforts as recommended by the PSC, and (iii) approving the allocation and payment of reasonable attorneys' fees to specified firms in amounts determined by the PSC to be reasonable and appropriate for common benefit efforts and in accordance with this Court's prior orders. The grounds therefore are set out in the accompanying memorandum filed herewith.

While the PSC files this motion now, as a practical matter we expect that counsel will not be paid, nor have their expenses reimbursed, until initial payment process is concluded (or nearly so). Virtually all claimants will have first received their first payments by the time the Court approves an allocation.

A memorandum in support and a declaration of Thomas M. Sobol are filed herewith. Exhibits A and B to the declaration reflect the PSC's proposed common benefit fee and expense allocations.

Dated: September 27, 2016

Respectfully submitted,

/s/ Thomas M. Sobol
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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Thomas M. Sobol, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: September 27, 2016

/s/ Thomas M. Sobol

Thomas M. Sobol, BBO # 471770